**REMARKS**

The non-final Office Action mailed February 24, 2006, has been carefully reviewed, and these remarks and amendments are responsive thereto. Reconsideration and allowance are respectfully requested. Claims 26, 27, 30-32, 39, and 41-45 remain pending. By this Amendment, claims 26, 27, 31, and 41 are amended. No new matter has been added.

***The Rejections***

Claims 26, 27, 30-32, 39, and 41-43 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,128,014 to Nakagawa et al. ("Nakagawa") in view of U.S. Patent No. 4,495,490 to Hopper ("Hopper"). Claims 44 and 45 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Nakagawa in view of U.S. Patent No. 6,043,809 to Holehan ("Holehan"). Applicants respectfully traverse all rejections in view of the amendments and remarks herein.

***Independent Claim 26***

As amended, claim 26 recites determining a first location in a document that corresponds to a first location of a pointer, determining a text line nearest the first location in the document, and moving the document to the text line.

Nakagawa clearly fails to teach or suggest determining a nearest text line. Nor does Hopper make up for this deficiency. Instead, Hopper discloses that, in conventional systems, scrolling breaks screen displays at convenient paragraph or sentence boundaries. Hopper, col. 3, lines 59-63. This is not the same as determining and moving to the text line that is *nearest* to a location, as claimed. More specifically, determining the nearest text line is not the same determination as determining a paragraph boundary (located at a line feed character) or a sentence boundary (located at a period).

Amended claim 26 further recites determining a second location in the document that corresponds to a second location of the pointer, and continuing to store the first location in the document after the second location in the document has been determined. Referring to an illustrative embodiment in Applicants' specification consistent with claim 26, both virtual and actual scrolling positions may be maintained. Specification, p. 18, paragraph 44. For instance, both a high-resolution virtual scrolling position as well as a more coarse scrolling position (such as in terms of whole text lines) may be used. *Id.* Each time the document is scrolled, the actual

scrolling position may be calculated based on the virtual scrolling position. Specification, Fig. 3; pp. 20-21, paragraph 49. Referring to claim 26, since the claimed first location in the document continues to be stored even though the document has moved to the nearest text line, this may make it possible for a subsequent virtual scrolling position (e.g., a subsequent text line) to depend upon the first location in the document (e.g., the virtual scrolling position). This may allow subtle changes in the user's inputs to add up over time (accumulating in the virtual scroll position), which may eventually affect the actual scrolling position. Specification, p. 21, paragraph 49.

In contrast, Nakagawa discloses calculating an amount to move an image based only on the difference between a pen's current position (xnow, ynow) and the pen's previous position (xprev, yprev), multiplied by a coefficient. Nakagawa, col. 7, lines 24-34. When a subsequent pen position is received, the values of (xprev, yprev) are replaced with the values of (xnow, ynow), and new (xnow, ynow) values are determined based on the subsequent pen position. Nakagawa, col. 7, lines 38-42. This process is also shown in Fig. 6 as steps 34-36.

It appears that the Office Action is comparing the claimed "first location in the document" with a given position in the image of Nakagawa. However, Nakagawa does not teach or suggest storing an image position at all; instead, Nakagawa discloses storing pen positions (xnow, ynow, xprev, yprev) and image movement amounts (i.e., *changes* in position). Although Nakagawa stores previous values of (xnow, ynow) as current values of (xprev, yprev), none of these values are positions in the image. In contrast, claim 26 recites storing *the first location* in the document.

Even if it were contended that Nakagawa must inherently store the current position in the image (which Applicants do not concede), there is nothing in Nakagawa that teaches or suggests how long a particular position in the image is stored.

Moreover, even if for the sake of argument it was argued that Nakagawa stores an image position and Hopper discloses determining and moving to a text line nearest to the image position (neither of which Applicants concede), such a proposed combination would, at best, modify the values of xnow and ynow to the nearest text line, and these modified values would eventually replace the values of xprev and yprev. At this point, the original unmodified values of xnow and ynow would not longer be stored.

In contrast, claim 26 recites that the first location in the document is continued to be stored *after* the second location in the document has been determined.

For at least these reasons, it is submitted that neither Nakagawa nor Hopper, either alone or in combination as proposed, teaches or suggests every feature recited in amended claim 26.

### *Independent Claim 41*

Claim 41 is amended only to correct minor typographical errors, and recites determining a first un-rounded location in a document based on a first location of a pointer, rounding the first un-rounded location in the document to a nearest first text line, and moving the document to the first text line. Thus, claim 41 is allowable for at least a similar reason as claim 26.

In addition, claim 41 further recites determining a second un-rounded location in the document based on both a second location of the pointer and the first un-rounded location in the document, rounding the second un-rounded location in the document to a nearest second text line, and moving the document to the second text line.

As previously discussed, the proposed modification of Nakagawa with Hopper would, at best, modify the values of (xnow, ynow) to break scrolling at sentence or paragraph boundaries. Since neither reference indicates why it would need the unmodified values of (xnow, ynow), these are inherently discarded. Therefore, it would not be possible for the proposed modified system to determine a second location in a document based on a discarded value. In contrast, claim 41 recites determining a second location in the document based on both a second location of the pointer and the first un-rounded location in the document.

For at least these reasons, it is submitted that neither Nakagawa nor Hopper, either alone or in combination as proposed, teaches or suggests every feature recited in claim 41.

### *Independent Claim 44*

Claim 44 recites determining a first location in a document based on a first gesture, determining a first text line based on the first location in the document, and moving the document to the first text line.

Nakagawa fails to teach or suggest determining a text line based on a location in a document, as claimed. It appears that the Examiner would likely agree with the previous statement (see Office Action, top of page 3, which states "Nakagawa et al fail to disclose the steps of rounding the location in the document to a nearest text line"). Indeed, Nakagawa does

not refer at all to text lines or indicate that it is aware of the location of any text line that might be in the image. And, Holehan does not make up for this deficiency of Nakagawa.

For at least this reason, it is submitted that neither Nakagawa nor Holehan, either alone or in combination as proposed, teaches or suggests every feature recited in claim 44.

### *Dependent Claims*

The remaining dependent claims are also allowable by virtue of their dependence on allowable independent claims, and further in view of the additional features recited therein.

### *Conclusion*

All rejections having been addressed, allowance and notification of the same are respectfully requested. Should the Examiner have any questions or believe that a telephone call or personal interview would be beneficial, she is invited to contact the undersigned at the number below.

Respectfully submitted,

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